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December 11, 2002

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE, Suite 110
Washington, D.C. 20002

**Re: In the Matter of Review of Section 251 Unbundling Obligations of Incumbent
Local Exchange Carriers and Implementation of the Local Competition
Provisions in the Telecommunications Act of 1996, CC Docket Nos. 01-338;
96-98; 98-147**

Dear Ms. Dortch:

On December 10, 2002, David Bogaty of WorldNet Telecommunications, Inc. ("WorldNet") and the undersigned met individually with Matthew Brill, Legal Advisor to Commissioner Abernathy, and Tom Navin, Robert Tanner, and Aaron Goldberger of the Wireline Competition Bureau. In these meetings, we discussed the Commission's examination of its UNE policies in light of the D.C. Circuit's *USTA* decision, and how the "impairment" analysis factors into the Commission's decision making. Additionally, we discussed the importance of UNE-P to WorldNet's ability to provide competitive telecommunications services in Puerto Rico, and to WorldNet's current migration to become a facilities-based carrier. WorldNet also emphasized that competition is nearly non-existent in Puerto Rico, and because of the unique characteristics of the island of Puerto Rico, the Commission should consider retaining UNE-P in Puerto Rico as a means of promoting facilities-based competition.

One electronic copy of this notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Respectfully submitted,

Lawrence R. Freedman
Aimee E. Knapp
Counsel for WorldNet Telecommunications, Inc.

Cc: Matthew Brill
Tom Navin
Robert Tanner
Aaron Goldberger

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